1	Scott A. Kronland (SBN 171693) Stacey M. Leyton (SBN 203827)			
2	Eileen B. Goldsmith (SBN 218029)			
3	Danielle E. Leonard (SBN 218201) Robin S. Tholin (SBN 344845)			
4	James Baltzer (SBN 332232) ALTSHULER BERZON LLP			
5	177 Post Street, Suite 300			
6	San Francisco, CA 94108 Tel. (415) 421-7151			
7	Fax (415) 362-8064			
8	skronland@altber.com sleyton@altber.com			
9	egoldsmith@altber.com dleonard@altber.com			
10	rtholin@altber.com			
	jbaltzer@altber.com			
11	Attorneys for Plaintiffs			
12 13	[Additional Counsel not listed]			
14	UNITED STATES DISTRICT COURT			
15	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
16	SAN FRANCISCO DIVISION			
17	AMERICAN FEDERATION OF	Case No. 3:25-cv-01780-WHA		
18 19	GOVERNMENT EMPLOYEES, AFL-CIO; AMERICAN FEDERATION OF STATE COUNTY AND MUNICIPAL EMPLOYEES, AFL-CIO, et al.,	SUPPLEMENTAL DECLARATION OF OSCAR ARBULU		
20	Plaintiffs,			
21 22	v.			
23	UNITED STATES OFFICE OF PERSONNEL MANAGEMENT, et al.,			
24	Defendants.			
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28	Supplemental Declaration of Oscar Arbulu, No. 3:25-cv-01780-WHA			

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## SUPPLEMENTAL DECLARATION OF OSCAR ARBULU

I, Oscar Arbulu, hereby declare as follows:

- I am the Deputy Political Director at Common Defense Civic Engagement. This 1. declaration is based on my personal knowledge, information, and belief, and supplements my previous declaration in support of Plaintiffs' TRO application (Dkt. 18-3).
- 2. Since first hearing about the mass terminations of federal probationary employees, Common Defense has received additional communications from members who have been terminated, sharing their stories about their experiences during this difficult time and harms caused to their lives by the terminations.
- 3. Multiple Common Defense members have reported to us that their VA services have been delayed or curtailed, and that they have had difficulty communicating with health personnel and scheduling medical appointments. One disabled veteran could not access therapy services and instead had to go outside the VA system and pay out of pocket for needed care.
- 4. One submission shared that a VA employee who had recently transitioned to working on the Veterans Crisis Line was terminated as part of the mass firing of probationary employees. The Veterans Crisis Line provides emergency mental health care—including crisis care and suicide prevention—for military veterans, service members, their families, and caregivers, and is supposed to be available 24/7. Many of our members have used the Veterans Crisis Line and rely on its availability to assist them if necessary. We have received communications from veterans with PTSD who are suffering and will suffer additional stress caused by the uncertainty of whether they will receive the support they need if they experience a crisis.
- 5. Common Defense members also rely on services provided by other agencies in which probationary employees were terminated. Research has shown that roughly 25% of miliary families experience food insecurity. Many service members and their families, including members of Common Defense, therefore rely on benefits provided by the Food and Nutrition Service, a component of USDA, including the Supplemental Nutrition Assistance Program (SNAP). Members

See https://www.rand.org/pubs/articles/2023/why-are-us-military-families-experiencing-foodinsecurity.html.

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of Common Defense also rely on federal educational assistance offered to veterans, both directly through VA programs offering education benefits to veterans and their families and through student loans and loan deferral, cancellation, and forgiveness programs administered by the Department of Education. For example, the Department of Education processes applications for Total and Permanent Disability Discharge, which relieves disabled veterans from federal student loan obligations entirely.

6. The mass terminations at agencies on which military families and veterans rely risk severe disruption to these services. Applications for benefits or questions about available programs will likely be delayed, given the reduction in available staff to respond to questions or provide assistance. According to the Department of Education's website, there is already a pause in processing Total and Permanent Disability Discharge applications at all, which is expected to end in "spring 2025." Any delays to the resumption of processing caused by mass terminations of Department of Education employees, and any new delays to the processing of other benefits provided by the VA, USDA, and Department of Education, will create additional administrative burdens for members of Common Defense and particularly harm food insecure military families and disabled veterans across the country.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 6th day of March 2025 in \_\_\_\_\_\_\_\_.

Oscar Arbulu

<sup>&</sup>lt;sup>2</sup> See https://studentaid.gov/manage-loans/forgiveness-cancellation/disability-discharge.
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